

United States District Court
FOR THE
NORTHERN DISTRICT OF CALIFORNIA
VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

FILED UNDER SEAL

CRAIG BOLLAND

DEFENDANT(S).

FILED

August 2, 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

INDICTMENT

3:23-cr-00238-VC

18 U.S.C. § 922(a)(1)(A) – Manufacturing and Dealing Firearms Without a License;
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm;
18 U.S.C. § 922(k) – Possession of a Firearm with Obliterated Serial Number;
18 U.S.C. § 922(o) – Possession of a Machinegun;
18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 2nd day of

August, 2023.

8/2/2023

Clerk

8/2/2023

Bail, \$ Warrant

1 ISMAIL J. RAMSEY (CABN 189820)
2 United States Attorney
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August 2, 2023
Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION **FILED UNDER SEAL**

11 UNITED STATES OF AMERICA,) CASE NO. 3:23-cr-00238-VC
12 Plaintiff,)
13 v.) VIOLATION:
14 CRAIG BOLLAND,) 18 U.S.C. § 922(a)(1)(A) – Manufacturing and
15 Defendant.) Dealing Firearms Without a License;
16) 18 U.S.C. § 922(g)(1) – Felon in Possession of a
17) Firearm;
18) 18 U.S.C. § 922(k) – Possession of a Firearm with
19) Obliterated Serial Number;
20) 18 U.S.C. § 922(o) – Possession of a Machinegun;
21) 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) –
22) Forfeiture Allegation
23)
24) SAN FRANCISCO VENUE

25 I N D I C T M E N T

26 The Grand Jury charges:

27 COUNT ONE: (18 U.S.C. § 922(a)(1)(A) – Manufacturing and Dealing Firearms Without a
28 License)

Beginning on or about June 1, 2021, and continuing through on or about May 30, 2023, in the
Northern District of California, the defendant,

CRAIG BOLLAND,

not being a licensed manufacturer and dealer of firearms within the meaning of Title 18, United States
Code, Chapter 44, did willfully engage in the business of manufacturing and dealing in firearms, in

INDICTMENT

1 violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

2 COUNT TWO: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)

3 On or about May 30, 2023, in the Northern District of California, the defendant,

4 CRAIG BOLLAND,

5 knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding
6 one year, knowingly possessed a firearm, namely one black Glock brand model 19 9mm caliber pistol
7 bearing serial number BFZC799, and one black IWI brand model Masada 9mm caliber pistol bearing
8 serial number M1035732, and the firearm was in and affecting interstate commerce, all in violation of
9 Title 18, United States Code, Section 922(g)(1).

10 COUNT THREE: (18 U.S.C. § 922(k) – Possession of a Firearm with Obliterated Serial Number)

11 On or about May 30, 2023, in the Northern District of California, the defendant,

12 CRAIG BOLLAND,

13 knowingly possessed a firearm, that is one black Intratec TEC-9 9mm caliber pistol, that had been
14 shipped and transported in interstate commerce, from which the manufacturer's serial number had been
15 removed, altered, and obliterated, in violation of Title 18, United States Code, Sections 922(k) and
16 924(a)(1)(B).

17 COUNT FOUR: (18 U.S.C. § 922(o) – Possession of a Machinegun)

18 On or about May 30, 2023, in the Northern District of California, the defendant,

19 CRAIG BOLLAND,

20 did knowingly possess a machinegun, that is, one black Glock brand model 19 9mm caliber pistol
21 bearing serial number BFZC799 and one black AR-15 style 5.56mm caliber rifle bearing no serial
22 number, in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

23 FORFEITURE ALLEGATION: (18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

24 The allegations contained in Counts One through Four of this Indictment are re-alleged and
25 incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code,
26 Section 924(d) and Title 28, United States Code, Section 2461(c).

27 Upon conviction of the offenses set forth in this Indictment, the defendant,

28 CRAIG BOLLAND,

1 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28,
2 United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the
3 offenses, including, but not limited to, the following property seized from the defendant's residence on
4 May 30, 2023:

- 5 a. One Glock brand, model 19, 9mm caliber pistol, bearing serial number BFZC799;
- 6 b. One Intratec brand, model TEC-9, 9mm caliber pistol, bearing no serial number;
- 7 c. One AR-15 style, 5.56mm caliber rifle, bearing no serial number;
- 8 d. One IWI brand, model Masada, 9mm caliber pistol, bearing serial number
9 M1035732;
- 10 e. One AK-47 style, 7.62mm caliber rifle, bearing serial number 16382;
- 11 f. One Polymer 80 Incorporated Model PF940V2 (frame), .40 caliber pistol, with Glock
12 22 barrel and slide, bearing serial number PDM876;
- 13 g. Any and all ammunition seized in or with the above firearms, including rifle and
14 pistol ammunition;
- 15 h. Any and all firearms parts seized with the above firearms, including slides, bolts,
16 receivers, frames, grips, rails, jigs, buttstocks, and buffer-tubes; and
- 17 i. Any and all firearms manufacturing equipment seized with the above firearms,
18 including 3D printers, hydraulic presses, drill presses, and one Ghost Gunner 3.

19 If any of the property described above, as a result of any act or omission of the defendant:

- 20 a. cannot be located upon exercise of due diligence;
- 21 b. has been transferred or sold to, or deposited with, a third party;
- 22 c. has been placed beyond the jurisdiction of the court;
- 23 d. has been substantially diminished in value; or
- 24 e. has been commingled with other property which cannot be divided without
25 difficulty,

26 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
27 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

28 //

1 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code,
2 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

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4 DATED: August 2, 2023

A TRUE BILL.

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6 */s/ Foreperson* _____
7 FOREPERSON
8 San Francisco, CA
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10 ISMAIL J. RAMSEY
11 United States Attorney
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/s/ George O. Hageman _____
GEORGE O. HAGEMAN
Assistant United States Attorney

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING**OFFENSE CHARGED**

Ct 1 – 18 U.S.C. § 922(a)(1)(A) – Manufacturing and Dealing Firearms Without a License; Ct 2 – 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm; Ct 3 – 18 U.S.C. § 922(k) – Possession of a Firearm with Obliterated Serial Number; Ct 4 – 18 U.S.C. § 922(o) – Possession of a Machinegun
 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c) – Forfeiture Allegation

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Ct 1: 5 years prison, \$250,000 fine, 3 years S.R., \$100 S.A., forfeiture
 Ct 2: 15 years prison, \$250,000 fine, 3 years S.R., \$100 S.A., forfeiture
 Ct 3: 5 years prison, \$250,000 fine, 3 years S.R., \$100 S.A., forfeiture
 Ct 4: 10 years prison, \$250,000 fine, 3 years S.R., \$100 S.A., forfeiture

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms & Explosives

person is awaiting trial in another Federal or State Court,
 give name of court

San Francisco Superior Court

this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprocution of
 charges previously dismissed
 which were dismissed on motion
 of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.
 }

this prosecution relates to a
 pending case involving this same
 defendant

prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

MAGISTRATE
 CASE NO.
 }

Name and Office of Person
 Furnishing Information on this form Ismail J. Ramsey

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned) George O. Hageman, AUSA

PROCESS:

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

→ Craig Bolland

FILED UNDER SEAL

DISTRICT COURT NUMBER

3:23-cr-00238-VC

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior
 summons was served on above charges →

2) Is a Fugitive

3) Is on Bail or Release from (show District)

FILED
 August 2, 2023

Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

IS IN CUSTODY

4) On this charge

5) On another conviction

6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

SF County Jail 2

Has detainer Yes
 been filed? No

} If "Yes"
 give date
 filed

DATE OF
 ARREST →

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
 TO U.S. CUSTODY →

Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**

SUMMONS NO PROCESS* WARRANT

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

Bail Amount: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments: